

# THE MARKS LAW FIRM, P.C.

---

January 22, 2020

**VIA ECF**

Hon. Katherine Polk Failla  
United States District Judge  
United States Courthouse  
40 Foley Square, Courtroom 618  
New York, New York 10007

**MEMO ENDORSED**

RE: Yovanny Dominguez v. Adria Operating Corporation  
Index: 19-cv-06723-KPF

Dear Judge Failla,

The undersigned counsel represents Plaintiff in the above referenced matter and respectfully requests an appearance before Your Honor to adjudicate the discovery issues.

On November 19, 2019, Plaintiff served its Rule 26 initial disclosures, combined discovery demands, and notice for deposition upon Defendant Adria Operating Corporation in accordance with your Honor's November 12, 2019 Case Management Plan and Scheduling Order. Plaintiff has not received adequate Defendant's initial disclosures (due 11/26/2019), any response to the discovery demands, or Defendant's initial requests or interrogatories (due by 12/13/2019).

Plaintiff and Defendant are at an impasse in trying to resolve the resolve the discovery issues. The parties meet and confer regarding the discovery disputes has proved unfruitful. Therefore, Plaintiff respectfully requests a conference to adjudicate the discovery issues by obtaining the necessary discovery before the close of fact discovery (3/13/2020).

Accordingly, Plaintiff respectfully requests a conference for the Court's guidance. We thank you and the Court for its time and consideration on this matter.

Regards,

The Marks Law Firm, P.C.

By: 

Bradly G. Marks

The parties are hereby ORDERED to appear for a conference to discuss discovery issues on **January 30, 2020, at 10:30 a.m.** in Courtroom 618 of the Thurgood Marshall Courthouse, 40 Foley Square, New York, NY.

Dated: January 23, 2020  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE